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DELIVERY VIA FAX AND MAIL

November 22, 2000

EPA Region 5 Records Ctr.



275113

Craig Melodia
Assistant Regional Counsel
Region 5, USEPA
C-14J
77 West Jackson Blvd.
Chicago, Ill. 60604-3590

Re: Skinner Landfill---Aeronca Inc.

Dear Craig:

I am writing on behalf of Aeronca, Inc., in response to your letter of November 8, 2000. Aeronca wishes to discuss settlement of your cost recovery claim. However, we are reluctant to waive our right to confidentiality and to provide to you the portions of the Allocator's report pertaining to Aeronca without knowing in more detail how that information will be used by you in our discussions. Our hesitancy arises from what we perceive to be major flaws in the Allocator's analysis of Aeronca's responsibility for remediation costs at the landfill. As an example, despite our contentions to the contrary, the Allocator applied only one allocation criterion---amount of waste sent to the landfill---in allocating a share of costs to Aeronca. He refused to consider other criteria ("Gore factors") that the Sixth Circuit requires to be considered in allocating costs among arrangers for disposal, which criteria substantially favor Aeronca. Accordingly, we think that the report is fundamentally flawed and highly misleading as to the proper share to be assigned to Aeronca.

I will contact you soon to discuss further your proposed use of the Allocator's report. Thank you for your assistance in this regard.

Yours truly,

A handwritten signature in cursive script that reads "David E. Northrop / del".

David E. Northrop

cc: John Furbay